

NORTH BAY WATER DISTRICT

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Attn: Lauren Bisnett, Public Affairs Office
California Department of Water Resources,
PO Box 942836
Sacramento, CA 94236
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Dear Authors of the Draft GSP Regulations:

Draft GSP Emergency Regulations Public Comment

As a GSA-eligible agency in both the Sonoma Valley and Petaluma Valley groundwater basins in Sonoma County and a potential member of their GSAs, the North Bay Water District would like to submit the following comments on the Draft GSP Regulations.

We appreciate your thorough work in incorporating the SGMA requirements into the draft GSP regulations.

By having § 358.4, Alternatives to GSP, you appear to avoid the one-size-fits-all trap. If the GSP, as prescribed in the draft regulations, were the only acceptable tool, many basins may find it hard to comply, since this "one size" happens to be the most expensive one. We haven't started gauging the voters' mood for new fees or taxes to finance the GSP preparation. But they may not let us have an ideal GSP when a less expensive approach could achieve the local groundwater sustainability.

The basic tenet of SGMA is that groundwater resources be managed at the local or regional level. GSAs, therefore, should be the primary responsible party for devising and implementing the best approaches to attaining the local or regional groundwater sustainability. The three types of Alternatives cited are applicable to certain situations only. Many basins need your support for developing their own solutions that may differ from any of the allowed Alternatives or the GSP as prescribed in the draft regulations.

Any Plan that a GSA adopts should be in substantial compliance with SGMA. We expect DWR to help and assure that a Plan meets reasonable technical standards and substantial compliance with SGMA without prejudging the Plan's effectiveness. The GSA bears the primary responsibility for attaining the local groundwater sustainability.

The Draft GSP Regulations incorporate detailed SGMA requirements faithfully and thoroughly. The document would be even more valuable if practical guidelines are laid out for GSAs to develop their own best Plans based on their local knowledge and expertise and within their political and economic reality.

Sincerely,



Jim Haire,
Chairman of the Board of Directors,
North Bay Water District

Board Members: Jim Haire, Mike Mulas, Norm Yenni, Craig Jacobsen, Tom Crane